

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TIMOTHY FRANKS, : CIVIL ACTION NO. 02-2652
Plaintiff, :
: :
: :
v. :
: :
COUNTY OF LEHIGH, :
THOMAS LAZORIK, :
BRIAN KAHLER, TED KEHM :
JANICE E. NESBIT, JANE :
BAKER, AND RICHARD O. KLOTZ, :
: :
Defendants. :

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSE TO
DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Timothy Franks, by and through his attorneys, Sidney L. Gold and Associates, P.C., hereby move this Court to enter an Order extending the deadline within which the Plaintiff shall respond to the Defendants' Motion for Summary Judgment until December 24, 2003 and in support thereof avers the following:

1. Presently pending before the Court is the Defendants' Motion for Summary Judgment which was dually filed with the Court on November 7, 2003.
2. Plaintiff in this case claims that he was terminated from his position of employment in violation of the Americans With Disabilities Act and the Pennsylvania Human Relations Act.
3. Approximately ten (10) depositions have been taken in this matter and the legal issues are very intricate and complex.

4. Defendants' Motion for Summary Judgment is approximately fifty (50) pages in length and entails numerous arguments and factual contentions in support of their Motion.

5. Accordingly, Plaintiff requests an additional thirty (30) days in which to respond to the Motion for Summary Judgment.

6. Plaintiff has notified Defense counsel of his intention to file the within Motion and Defense counsel has no opposition to the requested extension of time.

WHEREFORE, Plaintiff, Timothy Franks hereby moves this Court to enter an Order extending the time within which he shall file a response to the Defendants' Motion for Summary Judgment until December 24, 2003.

SIDNEY L. GOLD & ASSOCIATES, P.C.

By: _____
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